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* ADMITTED IN NY, FLA., AND D.C.

November 20, 2024

Via ECF

Honorable Laura T. Swain
Chief Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v. Gleen Anciro,
21-Cr-592-2 (LTS)

Dear Chief Judge Swain:

We represent Gleen Anciro in the above-referenced case. Ms. Anciro is currently out on a \$250,000 bond, secured by her husband and daughter. She is pending sentence.

I am writing the Court on an **emergency basis** requesting that Ms. Anciro's conditions of pre-trial release be temporarily modified to permit her to travel to the Philippines for up to one month as her mother, who lives there, was just hospitalized with Sepsis. The prognosis is dire. While in the Philippines, Ms. Anciro would stay with her sister, in Quezon City, which is a suburb just north of Manila. We have spoken with representatives of the government and pretrial, neither of whom object to this emergency travel. We will provide her complete itinerary to the government and to Pretrial.

Should the Court authorize this modification, we'd also request that pre-trial be authorized to **immediately** release Ms. Anciro's passport to her (or to undersigned counsel). The date of Ms. Anciro's departure is dependent on when the passport is released and travel can be arranged. Ms. Anciro successfully travelled to the Philippines last year to visit her then-ailing mother, who, at that time, recovered.

Thank you for considering this request.

The foregoing requests for a temporary modification of the conditions of pre-trial release and for the release of Ms. Anciro's passport are granted. This resolves DE # 326.

SO ORDERED.

11/20/2024

/s/ Laura Taylor Swain, Chief USDJ

Respectfully,



Nicholas G. Kaizer

cc: AUSA Timothy Capozzi (via ECF and e-mail)
USPO Robert Stehle (robert_stehle@nyept.uscourts.gov)